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**PROPOSED COUNSEL
FOR THE DEBTOR**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:

Builders Direct Sales Group, LLC

Debtor.

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Case No. 23-41064-11

(Chapter 11)

**MOTION TO EXTEND TIME TO FILE
CASH FLOW STATEMENT, STATEMENT OF OPERATIONS, AND BALANCE SHEET**

COMES NOW, Builders Direct Sales Group, LLC (the “**Debtor**”), and files this Motion to Extend Time (the “**Motion**”) to File Cash Flow Statement, Statement of Operations, and the Balance Sheet (the “**Deficient Documents**”), and respectfully states:

1. The Court has jurisdiction over this Motion pursuant to 28 U.S.C. § 1334. The Motion presents a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A) and (O). The Court has the authority to grant the requested relief in this Motion pursuant to Local Bankruptcy Rule 1007.1(b).

2. On April 15, 2023, the Debtor filed a petition for relief under Chapter 11 of Title 11 of the United States Code.

3. The Debtor requests an extension to file the Deficient Documents until Wednesday, May 3rd. Due to conflicts between counsel and the Debtor's schedule, counsel for the Debtor has not been able to compile all necessary information to meet the required deadline.

4. Because the creditors' meeting has not yet been scheduled, the Debtor expects that the proposed delay will still enable creditors to review the Deficient Documents in advance of the creditors' meeting.

5. Counsel's staff for the Debtor has complied with Local Rule 1007.1(b) by contacting the Office of the U.S. Trustee regarding this Motion. As of the filing of this Motion, no response has been received.

WHEREFORE, PREMISES CONSIDERED, the Debtor requests that the Court enter an order extending the time by which it may file the Deficient Documents until **May 3, 2023**, and grant such other relief as justice may require.

Dated: April 28, 2023.

Respectfully submitted,

By: /s/ Howard Marc Spector
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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing pleading was served via electronic means to all parties who receive ECF notice in this case on April 28, 2023.

/s/ Howard Marc Spector
Howard Marc Spector